

# ROCKWELL LIME COMPANY

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February 26, 2004

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

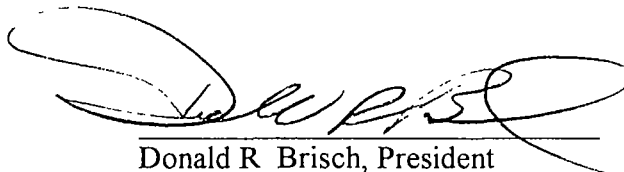
Northeast Region Air Program  
WI Department of Natural Resources  
1125 N. Military Ave.  
P.O. Box 10448  
Green Bay, WI 54307-0448

SUBJECT Rockwell Lime Company's Annual Certification of Compliance  
Air Pollution Control Operation Permit No 436034390-P01

Enclosed you will find Rockwell Lime Company's Annual Certification of Compliance for Air Pollution Control Operation Permit No 436034390-P01. The period covered under this report is July 1, 2003 to December 31, 2003

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the enclosed documents are true, accurate and complete

2/26/04  
Date

  
Donald R. Brisch, President  
Rockwell Lime Company

Encl RLC Certification of Compliance

Cc Compliance Data – Wisconsin  
Air and Radiation Division  
U S. EPA  
77 W. Jackson  
Chicago, IL 60604

**RECEIVED**

MAR 01 2004

AIR ENFORCEMENT BRANCH,  
U.S. EPA, REGION 5



**Rockwell Lime Company**  
**Certification of Compliance - Permit No. 436034390-P01**  
**7/1/03 - 12/31/03**

| Permit Term &/or Condition |  | Compliance Status |            |              | Method for Determining Compliance Status  |
|----------------------------|--|-------------------|------------|--------------|---|
|                            |  | Current           | Continuous | Intermittent |   |
| P<br>3<br>6                | Particulate emission rate $\leq$ 0.3#/ton of stone feed  | Yes               | Yes        |              | Average = 0.11#/ton of stone feed - 11/14/02 CAE stack test. C01 avg. inlet pressure = 6.5, max = 8.0, min = 2.8. |
|                            | Particulate emission rate $\leq$ 7.50#/hour  | Yes               | Yes        |              | Average = 2.6#/hr - 11/14/02 CAE stack test. C01 avg. inlet pressure = 6.5, max = 8.0, min = 2.8.                 |
|                            | Combined particulate emission rate $\leq$ 11.25#/hour for Process P36 & P33 operating at the same time | Yes               | Yes        |              | Average = 1.2#/hr - 12/20/00 CAE stack test. C01 avg. inlet pressure = 6.5, max = 8.0, min = 2.8.                 |
|                            | Fuel blend sulfur content $\leq$ 2.1% on a 24-hour basis (max. 147#/hr)                                | Yes               | Yes        |              | Average hourly sulfur input in the fuel = 108.26#/hr; Maximum = 146.28#/hr.                                       |
|                            | SO <sub>2</sub> emissions $\leq$ 5.5#/MMBtu  | Yes               | Yes        |              | Average = 3.19#/MMBtu, Maximum = 4.00#/MMBtu  |
|                            | Opacity $\leq$ 10%   | Yes               | Yes        |              | Average = 2.5%, Maximum = 9.0%  |
|                            | Nickel emission rate $\leq$ 0.09#/hour   | Yes               | Yes        |              | Average = 0.0005982#/hr - 11/14/02 CAE stack test. C01 avg. inlet pressure = 6.5, max = 8.0, min = 2.8.           |
| P<br>3<br>3                | Particulate emission rate $\leq$ 7.50#/hour  | Yes               | Yes        |              | Average = 1.2#/hr - 12/20/00 CAE stack test. C01 avg. inlet pressure = 6.5, max = 8.0, min = 2.8.                 |
|                            | Combined particulate emission rate $\leq$ 11.25#/hr for Process P36 & P33 operating at the same time   | Yes               | Yes        |              | Average = 1.2#/hr - 12/20/00 CAE stack test. C01 avg. inlet pressure = 6.5, max = 8.0, min = 2.8.                 |
|                            | SO <sub>2</sub> emissions $\leq$ 5.5#/MMBtu  | Yes               | Yes        |              | Average = 2.97#/MMBtu, Maximum = 3.35#/MMBtu  |

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|----------------------------|---|-------------------|--------------|---|
|                            |   | Current           | Intermittent |   |
| <b>P33</b>                 | Opacity $\leq$ 40% (Operating P33 alone)                          | Yes               | Yes          | Average = 2.5%, Maximum = 9.0%.   |
|                            | Opacity $\leq$ 10% (Operating P33 & P36 at the same time)         | Yes               | Yes          | Average = 2.5%, Maximum = 9.0%.   |
| <b>Part. Matter</b>        | $\leq$ 0.87 #/hr S24, P10   | Yes               | Yes          | Filter installed & operating properly.  |
|                            | $\leq$ 0.66 #/hr S30, P10   | Yes               | Yes          | Filter installed & operating properly.  |
| <b>Visible Emissions</b>   | $\leq$ 5% Opacity P04, P05, P06, P10                              | Yes               | Yes          | Daily log and method 9 reports.   |
| <b>Part. Matter</b>        | $\leq$ 0.16 #/hr SD21, P33 & P36                                  | Yes               | Yes          | Baghouse is in use when ash is removed. Ash is wetted and truck is located under shroud.  |
|                            | $\leq$ 0.24 #/hr SD25, P33 & P36                                  | Yes               | Yes          | Ash is wetted and truck is located under shroud.  |
| <b>Visible Emissions</b>   | $\leq$ 20% Opacity SD21 & SD25                                    | Yes               | Yes          | Baghouse is in use when ash is removed. Ash is wetted and truck is located under shroud.  |
| <b>P11</b>                 | Particulate Matter emission rate $\leq$ 0.5 #/hr & 0.05#/hr PM10  | Yes               | Yes          | Avg. pressure drop C13 = 4.0, max. = 5.0, min. = 2.0.   |
| <b>P38</b>                 | Particulate Matter emission rate $\leq$ 4.0 #/hr & 2.8#/hr PM10   | Yes               | Yes          | Average = 1.91#/hr - 7/17/01 CAE stack test. Liquid flow rate avg. = 89 gal/hr, min = 80 gal/hr. Pressure drop avg. = 20, max. = 25, min. = 10. |
| <b>P20</b>                 | Particulate Matter emission rate $\leq$ 0.52 #/hr & 0.03#/hr PM10 | Yes               | Yes          | Avg. pressure drop C21A = 1.0, max. = 1.0, min. = 1.0.  |

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|----------------------------|---|-------------------|------------|--------------|--|
|                            |   | Current           | Continuous | Intermittent |  |
| Visible Emissions          | ≤ 20% Opacity P11, P38, P20   | Yes               | Yes        |              | Same as P11, P38 & P20 above.  |
| P21                        | Particulate Matter emission rate ≤ 0.59 #/hr (S22)                                | Yes               | Yes        |              | Avg. pressure drop S22 = 4.0, max. = 7.0, min. = 3.0.  |
|                            | Particulate Matter emission rate ≤ 0.87 #/hr (S73F)                               | Yes               | Yes        |              | System is operated with an enclosed screw & telescoping spout.   |
|                            | Particulate Matter emission rate ≤ 0.24 #/hr (S23)                                | Yes               | Yes        |              | System is operated with an enclosed screw & telescoping spout.   |
|                            | ≤ 20% Opacity Process P21   | Yes               | Yes        |              | Same as above.   |
| P37                        | Particulate Matter emission rate ≤ 0.80 #/hr                                      | Yes               | Yes        |              | Process P37 did not operate in 2003.   |
| P21                        | Particulate Matter emission rate ≤ 0.16 #/hr (S79F)                               | Yes               | Yes        |              | Stack S79F did not operate in 2003.  |
| Visible Emissions          | ≤ 40% Opacity, P37 & S79F   | Yes               | Yes        |              | Process P37 & Stack S79F did not operate in 2003.  |
| Fugitive Emissions         | Precautions need to be taken to prevent particulate matter from becoming airborne | Yes               | Yes        |              | Fugitive Dust Plan submitted on 9/25/03. Employee training took place on 12/18/03. Water is applied to roads when weather permits. |
| Other Conditions           | Malfunction Prevention and Abatement Plan   | Yes               | Yes        |              | Plan is on site and was updated on 12/16/03.   |
|                            | Stack Condition   | Yes               | Yes        |              | Stack parameter records are on site.   |
|                            | Emissions Testing   | Yes               | Yes        |              | N/A during this time period.   |
|                            | Compliance Reports  | Yes               | Yes        |              | N/A during this time period.   |
|                            | Solid Fuel Sampling and Analysis  | Yes               | Yes        |              | Solid fuel analysis reports.   |
|                            | MACT Standard Part 2 Application  | Yes               | Yes        |              | N/A during this time period.   |